

Jason M. Hatfield (AR 97143)  
Lundy & Davis, LLP  
300 N. College Ave., Suite 309  
Fayetteville, AR 72701  
Tel: (479) 527-3921  
Fax: (479) 587-9196  
[jhatfield@lundydavis.com](mailto:jhatfield@lundydavis.com)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

X

**In Re Pet Foods Products  
Liability Litigation**

: **Civil Action No. 07-2867 (NLH)**  
:  
: **MDL DOCKET NO. 1850**  
:  
: **ALL CASES**

X

**CERTIFICATE OF COUNSEL**

Jason M. Hatfield, of full age, hereby certifies:

1. I am an attorney at law admitted in the State of Arkansas, with the Law Firm of Lundy & Davis, LLP, and represent plaintiffs Charles Ray Sims, Pamela Sims, Kirby Cooper, and Richard Schwinger.
2. This certification is submitted in support of the Motion for an order appointing William Audet, Jay Edelson, Scott Kamber, and the consumer Counsel Group as Interim Counsel for the Class in this Action.
3. I represent potential class members in Arkansas, Missouri, Kansas, Texas, California, Connecticut, Louisiana, Mississippi and Oklahoma.
4. I filed *Charles Ray Sims, et al. vs. Menu Foods Income Fund, et al.*, (C.A.

No. 1:07-3156) in the Western District of Arkansas on March 21, 2007.

5. I have had the opportunity to discuss strategy with many of the attorneys involved in this litigation, including attorneys from various groups vying for leadership.

6. I attended the meeting in Chicago, Illinois, on April 11, 2007, where it was suggested I refrain from serving the defendants with the Sims Complaint.

7. I was later advised by a member of a group vying for leadership to agree to a 60 day extension for defendants to answer the complaint.

8. I questioned this advice and contacted William Audet, of the Consumer Counsel Group.

9. Mr. Audet and I agreed on a strategy to avoid delay in prosecuting these cases.

10. Mr. Audet and the Consumer Counsel Group assisted me in opposing Defendants' Motion for Stay.

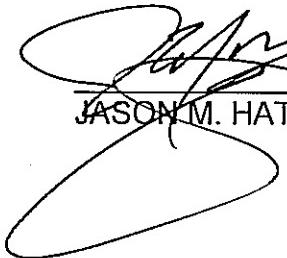
11. We were successful in this opposition and, in fact, were the only case that I know wherein the defendant answered the complaint.

12. The *Sims* case was set for jury trial on April 7, 2008, and discovery was about to commence prior to the transfer.

13. I am confident that William Audet, Jay Edelson, Scott Kamber, and the Consumer Counsel Group would be the most effective in leading this case in an orderly fashion and will avoid delay.

14. I have attached my resume as Exhibit A.

FURTHER, AFFIANT SAYETH NOT.



JASON M. HATFIELD

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned Notary Public,  
this 5<sup>th</sup> day of September, 2007.

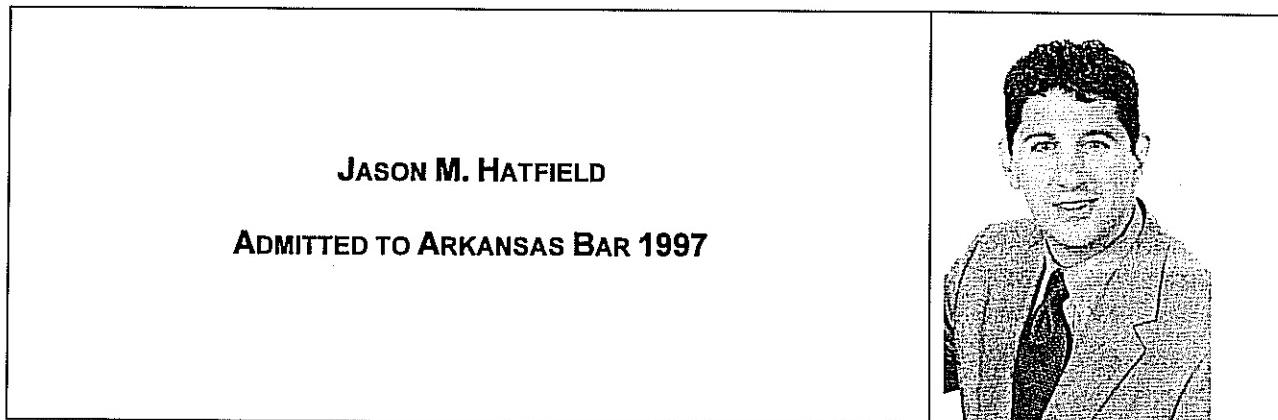
[SEAL]

My Commission Expires:  
02/01/16



Linda Daily  
Notary Public





Jason M. Hatfield was born in Maryville, Missouri. He attended the University of Arkansas in Fayetteville, Arkansas, and obtained a Bachelor of Science degree in Microbiology in 1991. In 1992, he began working on his Master of Science degree in Food Science and completed his Master's Thesis in 1994. The research he performed while obtaining his degree was later published in the Journal of Food Quality, titled "Minimizing Color Degradation in Blush Wines." He began law school while finishing his Master's Thesis and graduated from the University of Arkansas Law School in 1997.

While attending law school, Jason accepted a job as a law clerk at the Niblock Law Firm and continued working at the Niblock Law Firm after passing the Arkansas Bar Exam in 1997. Upon graduation, Jason was assigned most of the litigation work in practice areas of personal injury, first party insurance, Workers' Compensation and product liability. Jason participated in hundreds of depositions and bench trials. He has tried numerous cases to jury in Arkansas Circuit Courts and Federal Courts, and argued his jury verdict in *Boudreau v. Wal-Mart Stores, Inc.*, at the 8<sup>th</sup> Circuit Court of Appeals, No. 00-2273WAF.

In 2005, Jason became of-counsel with Lundy & Davis, LLP<sup>1</sup> and expanded his practice into the areas of class actions, toxic torts, mass torts and environmental litigation before state and federal courts throughout the region.

Jason sat second chair in the three week jury trial in the 4<sup>th</sup> Judicial District, Washington County, State of Arkansas, toxic tort case involving in excess of one hundred residents exposed to arsenic through the spreading of arsenic-laden chicken litter near their homes and schools. He continues to be involved with the case while on appeal. Jason is also actively involved in pharmaceutical litigation.

Jason dedicates a lot of time to his membership in the Arkansas Trial Lawyers Association, where he was elected by his peers to serve on the Board of Governors. He has also been appointed to the Legislative Committee and is a Champion of Justice and a member of the Golden Gavel Club. Jason is also a member of the American Association for Justice, Arkansas Bar Association, American Bar Association, Washington County Bar Association, Benton County Bar Association and Inns of Court.

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<sup>1</sup> The law firm of Lundy & Davis, with offices in Lake Charles, Louisiana, Houston, Texas, Jackson, Mississippi and Fayetteville, Arkansas, is able to offer legal services throughout the southeastern United States, with attorneys licensed to practice in Louisiana, Texas, Mississippi, and Arkansas. Members of the firm are involved in a number of class actions and mass torts, including: pharmaceutical litigation involving Fen-Phen, Rezulin, PPA, Baycol, Smith & Nephew Knee Implants, Ortho Evra® Patch, Vioxx®, Celebrex®, Bextra®, Accutane®, Crestor®, Zyprexa®, Neurontin®, Seroquel®, and Serzone®; hazardous materials exposure to asbestos, silica dust, manganese, vinyl chloride, arsenic, and benzene; occupational diseases including mesothelioma, silicosis, and manganism.